	Case 4:20-cv-03664-YGR Document 718-	1 Filed 08/29/22 Page 1 of 10
1 2 3 4 5 6 7 8 9		
10	UNITED STATES	DISTRICT COURT
11	NORTHERN DISTRICT OF CAL	IFORNIA, OAKLAND DIVISION
12		
13141516	CHASOM BROWN, WILLIAM BYATT, JEREMY DAVIS, CHRISTOPHER CASTILLO, and MONIQUE TRUJILLO, individually and on behalf of all similarly situated,	Case No. 4:20-cv-3664-YGR-SVK [PROPOSED] ORDER GRANTING MOTION TO SEAL Hon. Susan van Keulen, USMJ
17	Plaintiffs,	
18	V.	
19 20 21 22	GOOGLE LLC, Defendant.	
23		
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25		
26		
27		
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[PROPOSED] ORDER

Before the Court is Plaintiffs' Administrative Motion to File Under Seal Portions of Plaintiffs'

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Motion for Relief re: Google's Production of Documents Improperly Withheld as Privileged, Dkt. 671

("Motion"). Having considered the Motion, supporting declarations, and other papers on file, and

Basis for Sealing Portion of Document

good cause having been found, the Court **ORDERS** as follows:

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Document	
Plaintiffs' Administrative Motion for Relief re: Google's Production of Documents Improperly Withheld as Privileged	

Document Sought to
be Sealed
GRANTED as to the
portions at:

Portion of

Pages: 1:8-10, 4:7-8

GRANTED as to the

The information requested to be sealed contains Google's highly confidential and proprietary information regarding highly sensitive features of Google's internal systems and operations, including Google's internal projects, identifiers, and their proprietary functionalities, Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential and proprietary information reveals Google's internal strategies, system designs, and business practices for operating and maintaining many of its important services, and falls within the protected scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and proprietary information could affect competitive standing Google's competitors may alter their systems and practices relating to competing products. It may also place Google at an increased risk of cybersecurity threats, as third parties may seek to use the information to compromise Google's internal practices relating to competing products. The information requested to be sealed

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Exhibit A - Documents

to this Court's June 10,

2022 Order (Dkt. 605)

Google Produced Pursuant

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contains Google's highly confidential and portions at: proprietary information regarding highly sensitive features of Google's internal Pages: 2:18-20, 5:14systems and operations, including 16 Google's internal projects, identifiers, and their proprietary functionalities,

1			Google maintains as confidential in the
$_{2}\Vert$			ordinary course of its business and is not
2			generally known to the public or Google's
3			competitors. Such confidential and
			proprietary information reveals Google's
4			internal strategies, system designs, and
5			business practices for operating and maintaining many of its important
			services, and falls within the protected
6			scope of the Protective Order entered in
7			this action. See Dkt. 81 at 2-3. Public
/			disclosure of such confidential and
8			proprietary information could affect
_			Google's competitive standing as
9			competitors may alter their systems and
10			practices relating to competing products.
			It may also place Google at an increased
11			risk of cybersecurity threats, as third parties may seek to use the information to
12			compromise Google's internal practices
12			relating to competing products.
13	Exhibit C - September 8,	GRANTED as to the	The information requested to be sealed
14	2021 Letter re: Privilege	portions at:	contains Google's highly confidential and
14	Log		proprietary information regarding highly
15		Page 6	sensitive features of Google's internal
1.6			systems and operations, including
16			Google's internal projects, identifiers, and
17			their proprietary functionalities, that Google maintains as confidential in the
			ordinary course of its business and is not
18			generally known to the public or Google's
19			competitors. Such confidential and
17			proprietary information reveals Google's
20			internal strategies, system designs, and
21			business practices for operating and
۷۱			maintaining many of its important
22			services, and falls within the protected
			scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public
23			disclosure of such confidential and
24			proprietary information could affect
			Google's competitive standing as
25			competitors may alter their systems and
26			practices relating to competing products.
			It may also place Google at an increased
27			risk of cybersecurity threats, as third
28			parties may seek to use the information to
۷٥			compromise Google's internal practices

$_{1}\ $			relating to competing products.
	Exhibit 2 - GOOG-BRWN-	GRANTED as to the	The information requested to be sealed
2	00855317	portions at:	contains Google's highly confidential and
3			proprietary information regarding highly
		Entirely	sensitive features of Google's internal
4			systems and operations, including
5			Google's internal projects, identifiers, and their proprietary functionalities, that
			Google maintains as confidential in the
6			ordinary course of its business and is not
7			generally known to the public or Google's
′			competitors. Such confidential and
8			proprietary information reveals Google's
9			internal strategies, system designs, and
			business practices for operating and maintaining many of its important
10			services, and falls within the protected
$_{11}$			scope of the Protective Order entered in
			this action. See Dkt. 81 at 2-3. Public
12			disclosure of such confidential and
13			proprietary information could affect Google's competitive standing as
			Google's competitive standing as competitors may alter their systems and
14			practices relating to competing products.
15			It may also place Google at an increased
			risk of cybersecurity threats, as third
16			parties may seek to use the information to
17			compromise Google's internal practices relating to competing products.
.	Exhibit 3 - GOOG-CABR-	GRANTED as to the	The information requested to be sealed
18	05949445	portions at:	contains Google's highly confidential and
19		_	proprietary information regarding highly
_		Entirely	sensitive features of Google's internal
20			systems and operations, including Google's internal projects, identifiers, and
21			their proprietary functionalities, that
$_{22}$			Google maintains as confidential in the
			ordinary course of its business and is not
23			generally known to the public or Google's
$_{24}\ $			competitors. Such confidential and proprietary information reveals Google's
			internal strategies, system designs, and
25			business practices for operating and
26			maintaining many of its important
			services, and falls within the protected
27			scope of the Protective Order entered in this action. See Dkt. 81 at 2-3. Public
28			disclosure of such confidential and
			distribute of such confidential and

1			proprietary information could affect
2			Google's competitive standing as
-			competitors may alter their systems and
3			practices relating to competing products. It may also place Google at an increased
,			risk of cybersecurity threats, as third
4			parties may seek to use the information to
5			compromise Google's internal practices
			relating to competing products.
6	Exhibit 4 - GOOG-BRWN-	GRANTED as to the	The information requested to be sealed
7	00856066	portions at:	contains Google's highly confidential and
		T (* 1	proprietary information regarding highly
8		Entirely	sensitive features of Google's internal systems and operations, including
9			Google's internal projects, identifiers, and
			their proprietary functionalities, that
10			Google maintains as confidential in the
11			ordinary course of its business and is not
.			generally known to the public or Google's
12			competitors. Such confidential and
13			proprietary information reveals Google's internal strategies, system designs, and
			business practices for operating and
14			maintaining many of its important
15			services, and falls within the protected
			scope of the Protective Order entered in
16			this action. See Dkt. 81 at 2-3. Public
17			disclosure of such confidential and proprietary information could affect
			Google's competitive standing as
18			competitors may alter their systems and
19			practices relating to competing products.
			It may also place Google at an increased
20			risk of cybersecurity threats, as third
21			parties may seek to use the information to compromise Google's internal practices
			relating to competing products.
22	Exhibit 5 - GOOG-BRWN-	GRANTED as to the	The information requested to be sealed
23	00856578	portions at:	contains Google's highly confidential and
			proprietary information regarding highly
24		Entirely	sensitive features of Google's internal
25			systems and operations, including
			Google's internal projects, identifiers, and their proprietary functionalities, that
26			Google maintains as confidential in the
27			ordinary course of its business and is not
			generally known to the public or Google's
28			competitors. Such confidential and

1			proprietary information reveals Google's
2			internal strategies, system designs, and
_			business practices for operating and maintaining many of its important
3			services, and falls within the protected
4			scope of the Protective Order entered in
1			this action. See Dkt. 81 at 2-3. Public
5			disclosure of such confidential and
6			proprietary information could affect
			Google's competitive standing as
7			competitors may alter their systems and practices relating to competing products.
8			It may also place Google at an increased
0			risk of cybersecurity threats, as third
9			parties may seek to use the information to
10			compromise Google's internal practices
	Exhibit 6 - GOOG-BRWN-	GRANTED as to the	relating to competing products.
11	00857642	portions at:	The information requested to be sealed contains Google's highly confidential and
12		pertiens an	proprietary information regarding highly
		Entirely	sensitive features of Google's internal
13			systems and operations, including
14			Google's internal projects, identifiers, and
1			their proprietary functionalities, that Google maintains as confidential in the
15			ordinary course of its business and is not
16			generally known to the public or Google's
17			competitors. Such confidential and
1 /			proprietary information reveals Google's
18			internal strategies, system designs, and business practices for operating and
19			maintaining many of its important
			services, and falls within the protected
20			scope of the Protective Order entered in
21			this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and
			proprietary information could affect
22			Google's competitive standing as
23			competitors may alter their systems and
24			practices relating to competing products.
24			It may also place Google at an increased risk of cybersecurity threats, as third
25			parties may seek to use the information to
26			compromise Google's internal practices
			relating to competing products.
27	Exhibit 10 - GOOG- BRWN-00848723	GRANTED as to the	The information requested to be sealed
28	DIX W IN-00040 / 23	portions at:	contains Google's highly confidential and proprietary information regarding highly
			proprietary information regarding inginy

1		Pages: -725-727	sensitive features of Google's internal
2			systems and operations, including
			Google's internal projects, identifiers, and their proprietary functionalities, that
3			Google maintains as confidential in the
4			ordinary course of its business and is not
			generally known to the public or Google's
5			competitors. Such confidential and
6			proprietary information reveals Google's internal strategies, system designs, and
_			business practices for operating and
7			maintaining many of its important
8			services, and falls within the protected
9			scope of the Protective Order entered in
9			this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and
10			proprietary information could affect
11			Google's competitive standing as
			competitors may alter their systems and
12			practices relating to competing products. It may also place Google at an increased
13			risk of cybersecurity threats, as third
14			parties may seek to use the information to
14			compromise Google's internal practices
15	Exhibit 12 - GOOG-	GRANTED as to the	relating to competing products. The information requested to be sealed
16	CABR-05888096	portions at:	contains Google's highly confidential and
			proprietary information regarding highly
17		Entirely	sensitive features of Google's internal
18			systems and operations, including Google's internal projects, identifiers, and
19			their proprietary functionalities, that
			Google maintains as confidential in the
20			ordinary course of its business and is not generally known to the public or Google's
21			competitors. Such confidential and
22			proprietary information reveals Google's
			internal strategies, system designs, and
23			business practices for operating and maintaining many of its important
24			services, and falls within the protected
25			scope of the Protective Order entered in
			this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and
26			proprietary information could affect
27			Google's competitive standing as
			competitors may alter their systems and
28			practices relating to competing products.

1			It may also place Google at an increased
			risk of cybersecurity threats, as third
2			parties may seek to use the information to
3			compromise Google's internal practices
			relating to competing products.
4	Exhibit 13 - GOOG-	GRANTED as to the	The information requested to be sealed
5	BRWN-00853326	portions at:	contains Google's highly confidential and
³		Dagger 226 220	proprietary information regarding highly
6		Pages: -326, -329-	sensitive features of Google's internal systems and operations, including
_		331	Google's internal projects, identifiers, and
7			their proprietary functionalities, that
8			Google maintains as confidential in the
			ordinary course of its business and is not
9			generally known to the public or Google's
10			competitors. Such confidential and
10			proprietary information reveals Google's
11			internal strategies, system designs, and business practices for operating and
12			maintaining many of its important
12			services, and falls within the protected
13			scope of the Protective Order entered in
14			this action. See Dkt. 81 at 2-3. Public
14			disclosure of such confidential and
15			proprietary information could affect
16			Google's competitive standing as competitors may alter their systems and
10			practices relating to competing products.
17			It may also place Google at an increased
18			risk of cybersecurity threats, as third
10			parties may seek to use the information to
19			compromise Google's internal practices
20	F 112 15 COOC	CDANTED 4 41	relating to competing products.
20	Exhibit 15 - GOOG- BRWN-00850441	GRANTED as to the portions at:	The information requested to be sealed contains Google's highly confidential and
21	210111 00000111	portions at.	proprietary information regarding highly
		Entirely	sensitive features of Google's internal
22			systems and operations, including
23			Google's internal projects, identifiers, and
$\int_{\Lambda} \ $			their proprietary functionalities, that
24			Google maintains as confidential in the
25			ordinary course of its business and is not generally known to the public or Google's
			competitors. Such confidential and
26			proprietary information reveals Google's
$27 \ $			internal strategies, system designs, and
			business practices for operating and
28			maintaining many of its important
- 11			

1			services, and falls within the protected
$2 \parallel$			scope of the Protective Order entered in
			this action. See Dkt. 81 at 2-3. Public disclosure of such confidential and
3			proprietary information could affect
4			Google's competitive standing as
7			competitors may alter their systems and
5			practices relating to competing products.
6			It may also place Google at an increased
0			risk of cybersecurity threats, as third
7			parties may seek to use the information to
8			compromise Google's internal practices relating to competing products.
8	Exhibit 16 - Expert Report	GRANTED as to the	The information requested to be sealed
9	of Prof. On Amir	portions at:	contains Google's highly confidential and
10			proprietary information regarding highly
10		Pages 2-4	sensitive features of Google's internal
11			systems and operations, including
12			Google's internal projects, identifiers, and their proprietary functionalities, that
12			Google maintains as confidential in the
13			ordinary course of its business and is not
14			generally known to the public or Google's
17			competitors. Such confidential and
15			proprietary information reveals Google's
16			internal strategies, system designs, and business practices for operating and
			maintaining many of its important
17			services, and falls within the protected
18			scope of the Protective Order entered in
			this action. See Dkt. 81 at 2-3. Public
19			disclosure of such confidential and proprietary information could affect
20			Google's competitive standing as
			competitors may alter their systems and
21			practices relating to competing products.
22			It may also place Google at an increased
			risk of cybersecurity threats, as third parties may seek to use the information to
23			compromise Google's internal practices
24			relating to competing products.
25	Exhibit 17 - Expert Report	GRANTED as to the	The information requested to be sealed
23	of Bruce Strombom	portions at:	contains Google's highly confidential and
26		Pagas i ii 21	proprietary information regarding highly
27		Pages: i-ii, 21	sensitive features of Google's internal systems and operations, including
~ /			Google's internal projects, identifiers, and
28			their proprietary functionalities, that
- 11	·	<u> </u>	<u> </u>